

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re: ) Case No. 19-40883-659  
) Chapter 11  
PAYLESS HOLDINGS LLC, *et al.*, )  
) Jointly Administered  
Debtors. )  
) **Hearing Date:** March 14, 2019  
) **Hearing Time:** 10:00 a.m. (Central Time)  
) **Hearing Location:** Courtroom 7 North

**SECOND AMENDED AGENDA OF MATTERS  
SCHEDULED FOR HEARING ON MARCH 14, 2019**

Time of Hearing: 10:00 a.m. (Central Time)

Location of Hearing: United States Bankruptcy Court for the Eastern District of Missouri,  
Thomas F. Eagleton Federal Building, 7<sup>th</sup> floor, North Courtroom,  
111 S. 10<sup>th</sup> Street, St. Louis, Missouri 63102

**I. Adjourned Matters**

1. **Cash Collateral Motion.** Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 and Bankruptcy Rules 2002, 4001, and 9014 (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay and (IV) Scheduling a Final Hearing [Docket No. 61]

**Status:** The hearing on this matter is adjourned until March 28, 2019 at 10:00 a.m. (CT).

**Objection Deadline:** March 21, 2019. The Committee's objection deadline is March 22, 2019.

**Related Documents:** Interim Order Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying Automatic Stay, and (4) Scheduling a Final Hearing [Docket No. 138]

Notice of Final Hearing on Certain "First Day" Motions [Docket No. 136]

**Objections Received:** None to date.

2. **DIP Motion.** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens and Providing Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 216]

**Status:** The hearing on this matter is adjourned until March 28, 2019 at 10:00 a.m. (CT).

**Objection Deadline:** March 21, 2019. The Committee's objection deadline is March 22, 2019.

**Related Documents:** Declaration of Derek C. Pitts in Support of The Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing (II) Granting Liens and Providing Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 246]

Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens and Providing Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 265]

**Objections Received:** None to date.

3. **Cash Management Motion.** Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms and (D) Continue to Perform Intercompany Transactions and (II) Granting Related Relief [Docket No. 11]

**Status:** The hearing on this matter is adjourned until March 28, 2019 at 10:00 a.m. (CT).

**Objection Deadline:** March 21, 2019. The Committee's objection deadline is March 22, 2019.

**Related Documents:** Interim Order Granting Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms and (D) Continue to Perform Intercompany Transactions and (II) Granting Related Relief [Docket No. 89]

**Objections Received:** None to date.

4. ***Motion for Relief from Stay.*** Joint Motion of Westchester Fire Insurance Company and Federal Insurance Company for Relief from the Automatic Stay to Cancel Surety Bonds and for Adequate Protection Pursuant to 11 U.S.C. § 362 [Docket Nos. 278 & 290]

***Status:*** The hearing on this matter is adjourned until March 28, 2019 at 10:00 a.m. (CT).

***Objection Deadline:*** March 21, 2019.

***Related Documents:*** Motion for Expedited Hearing Regarding Joint Motion of Westchester Fire Insurance Company and Federal Insurance Company for Relief from the Automatic Stay to Cancel Surety Bonds and for Adequate Protection Pursuant to 11 U.S.C. § 362 [Docket No. 281].

***Objections Received:*** None to date.

## **II. Matters Going Forward**

1. ***Store Closing Motion.*** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Docket No. 24]

***Status:*** The hearing on this matter is going forward. The Debtors included comments received from interested parties in the Proposed Final Order.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 11, 2019.

***Related Documents:*** Declaration of Joseph A. Malfitano in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Approving Procedures for Store Closing Sales and (III) Granting Related Relief [Docket No. 37]

Interim Order Authorizing the Debtors to Assume the Consulting Agreement, (II) Approving Procedures for Store Closing Sales and (III) Granting Related Relief [Docket No. 119]

Debtor's Omnibus Reply to Objections to Certain First Day Motions and Related Relief [Docket No. 513]

***Objections Received:*** Limited Objection of MIR Hanson Associates, LLC to Debtors' Motions for Entry of Orders: (A)(I) Authorizing Debtors to Assume the Consulting Agreement, (II) Approving Procedures for Store Closing Sales and (III) Granting Related Relief; and (B)(I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 434]

Objection of Levy Property Entities to Motion to Approve Store Closing Procedures [Docket No. 443]

1604 Chestnut Associates LP to Debtors' Motions for Entry of Orders: (A)(I) Authorizing Debtors to Assume the Consulting Agreement, (II) Approving Procedures for Store Closing Sales and (III) Granting Related Relief; and (B)(I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 445]

2. ***Lease and Contract Procedures:*** Debtors' Motion Seeking Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 23]

***Status:*** The hearing on this matter is going forward. The Debtors included comments received from interested parties in the Proposed Final Order.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 11, 2019.

***Related Documents:*** Notice of Hearing [Docket No. 137]

Debtor's Omnibus Reply to Objections to Certain First Day Motions and Related Relief [Docket No. 513]

***Objections Received:*** 1604 Chestnut Associates LP to Debtors' Motions for Entry of Orders: (A)(I) Authorizing Debtors to Assume the Consulting Agreement, (II) Approving Procedures for Store Closing Sales and (III) Granting Related Relief; and (B)(I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 445]

Limited Objection of Certain Utility Companies to the Debtors' Motion Seeking Entry of An Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 423]

3. ***Wages Motion.*** Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 5]

***Status:*** The hearing on this matter is going forward.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 12, 2019.

***Related Documents:*** Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 118]

***Objections Received:*** None to date.

4. ***Critical Vendors Motion.*** Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Critical Vendors and (B) Carriers and Warehousemen and (B) Granting Related Relief [Docket No. 10]

***Status:*** The hearing on this matter is going forward. The Debtors included comments received from interested parties in the Proposed Final Order.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 11, 2019.

***Related Documents:*** Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Critical Vendors and (B) Carriers and Warehousemen and (II) Granting Related Relief [Docket No. 88]

Debtor's Omnibus Reply to Objections to Certain First Day Motions and Related Relief [Docket No. 513]

***Objections Received:*** Statement of Position on Debtors' Motion to Pay Pre-Petition Claims of Critical Vendors, Carriers and Warehousemen [Docket No. 446]

5. ***Surety Bond Motion.*** Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue and Renew the Surety Bond Program on an Uninterrupted Basis, and (II) Granting Related Relief [Docket No. 21].

***Status:*** The hearing on this matter is going forward.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 11, 2019.

***Related Documents:*** Interim Order (I) Authorizing the Debtors to Continue and Renew the Surety Bond Program on an Uninterrupted Basis, and (II) Granting Related Relief [Docket No. 196]

Debtor's Omnibus Reply to Objections to Certain First Day Motions and Related Relief [Docket No. 513]

***Objections Received:*** Objection of Liberty Mutual Insurance Company and Safeco Insurance Company to Debtors' Motion to Continue and Renew Surety Bond Program [Docket No. 429].

6. ***NOL Motion.*** Debtors' Motion Seeking Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Docket No. 9]

***Status:*** The hearing on this matter is going forward. The Debtors included comments received from interested parties in the Proposed Final Order.

**Objection Deadline:** March 7, 2019. The Committee's objection deadline is March 11, 2019.

**Related Documents:** Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Docket No. 253]

**Objections Received:** None to date.

7. **Utilities Motion.** Debtors' Motion Seeking Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief [Docket No. 19]

**Status:** The hearing on this matter is going forward.

**Objection Deadline:** March 7, 2019. The Committee's objection deadline is March 11, 2019.

**Related Documents:** Interim Order (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Service, (III) Establishing Procedures for Determining Adequate Assurance of Payment and (IV) Granting Related Relief [Docket No. 194]

Debtor's Omnibus Reply to Objections to Certain First Day Motions and Related Relief [Docket No. 513]

**Objections Received:** Objection of Certain Utility Companies to the Debtors' Motion Seeking Entry of an Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief [Docket No. 422] **[WITHDRAWN – DOCKET NO. 514]**

8. **Insurance Motion.** Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto and (B) Renew, Supplement, or Purchase Insurance Policies, and (II) Granting Related Relief [Docket No. 20]

**Status:** The hearing on this matter is going forward.

**Objection Deadline:** March 7, 2019. The Committee's objection deadline is March 11, 2019.

**Related Documents:** Interim Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition Obligations related thereto and (B) Renew, Supplement, or Purchase Insurance Policies and (II) Granting Related Relief [Docket No. 195]

**Objections Received:** None to date.

9. **Taxes Motion.** Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 28]

**Status:** The hearing on this matter is going forward.

**Objection Deadline:** March 7, 2019. The Committee's objection deadline is March 11, 2019.

**Related Documents:** Interim Order (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 200]

**Objections Received:** None to date.

10. **Armstrong Teasdale Retention Application.** Application of the Debtors and Debtors in Possession, Pursuant to Sections 327(A) and 329(A) of the Bankruptcy Code, Bankruptcy Rules 2014(A) and 2016(B), and Local Bankruptcy Rules 2014(A) and 2016-1, for an Order Authorizing the Debtors and Debtors in Possession to Retain and Employ Armstrong Teasdale LLP as Co-Restructuring Counsel Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 25]

**Status:** The hearing on this matter is going forward.

**Objection Deadline:** March 7, 2019. The Committee's objection deadline is March 11, 2019.

**Related Documents:** Interim Order (I) Authorizing the Debtors and Debtors in Possession to Retain and Employ Armstrong Teasdale LLP as Co-Restructuring Counsel Effective *Nunc Pro Tunc* to the Petition Date and (II) Scheduling Final Hearing [Docket No. 197]

Supplemental Declaration of Richard W. Engel, Jr. in Support of the Application of the Debtors Pursuant to Sections 327(A) and 329(A) of the Bankruptcy Code, Bankruptcy Rules 2014(A) and 2016(B), and Local Bankruptcy Rules 2014(A) and 2016-1, for an Order Authorizing the Debtors to Retain and Employ Armstrong Teasdale LLP as Co-Restructuring Counsel Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 442]

**Objections Received:** None to date.



11. ***Akin Gump Retention Application.*** Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Akin Gump Strauss Hauer & Feld LLP as Counsel to the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 33]

***Status:*** The hearing on this matter is going forward.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 11, 2019.

***Related Documents:*** Interim Order Approving Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Akin Gump Strauss Hauer & Feld LLP as Co-Counsel to the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 295]

First Supplemental Declaration of Meredith Lahaie in Support of the Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Akin Gump Strauss Hauer & Feld LLP as Counsel to the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 414]

Limited Response of Alden Global Capital LLC to Limited Objections of (I) the Ad Hoc Group of Prepetition Term Lenders and Axar Capital Management and (II) the Official Committee of Unsecured Creditors to the Debtors' Applications to Retain Counsel [Docket No. 515]

Debtors' Response to (1) Joint Limited Objection of the Ad Hoc Group of Prepetition Term Loan Lenders and Axar Capital Management to Debtors' Application to Retain Counsel and (2) Limited Objection and Joinder of the Official Committee of Unsecured Creditors to the Debtors' Applications to Retain Counsel [Docket No. 520]

Motion to Quash Document Request of the Ad Hoc Group of Prepetition Term Loan Lenders, Motion to Shorten Time for Response, and Incorporated Memorandum in Support [Docket No. 535]

Debtors' Motion for Entry of an Order (I) Scheduling an Expedited Hearing, (II) Approving the Form and Manner of Notice Thereof, and (III) Granting Related Relief [Docket No. 536]

***Objections Received:*** Joint Limited Objection and Reservation of Rights of the Ad Hoc Group of Prepetition Term Loan Lenders and Axar Capital Management to the Debtors' Applications to Retain Counsel [Docket No. 444]

Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Applications to Retain Counsel and Joinder in Part to the Joint Limited Objection and Reservation of Rights of the Ad Hoc Group of Prepetition Term Loan Lenders and Axar Capital Management to Such Applications [Docket No. 488]



12. ***PJ Solomon Retention Application.*** Application of the Debtors for Appointment of PJ Solomon as Investment Banker to the Debtors Effective as of the Petition Date [Docket No. 34]

***Status:*** The hearing on this matter is going forward.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 12, 2019.

***Related Documents:*** Interim Order Authorizing Retention and Appointment of PJ Solomon as Investment Banker *Nunc Pro Tunc* to the Petition Date [Docket No. 296]

First Supplemental Declaration of Derek Pitts in Support of Application of the Debtors for Appointment of PJ Solomon as Investment Banker to the Debtors Effective as of the Petition Date [Docket No. 430]

***Objections Received:*** None to date.

13. ***Seward & Kissel LLP Retention Application.*** Debtors' Application for Entry of an Order Pursuant to Section 327(a) of the Bankruptcy Code Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel to the Debtors Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 29]

***Status:*** The hearing on this matter is going forward.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 11, 2019.

***Related Documents:*** Interim Order Approving Debtors' Application for Entry of an Order Pursuant to Section 327(a) of the Bankruptcy Code Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel to the Debtors Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 292]

First Supplemental Declaration of John R. Ashmead in Support of Debtors' Application for Entry of an Order Pursuant to Section 327(A) of the Bankruptcy Code Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel to the Debtors Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 415]

Limited Response of Alden Global Capital LLC to Limited Objections of (I) the Ad Hoc Group of Prepetition Term Lenders and Axar Capital Management and (II) the Official Committee of Unsecured Creditors to the Debtors' Applications to Retain Counsel [Docket No. 515]

Separate Response of the Debtors to (1) *Joint Limited Objection of the Ad Hoc Group of Prepetition Term Loan Lenders and Axar Capital Management to Debtors' Applications to Retain Counsel* and (2) *Limited Objection and Joinder of the Official Committee of Unsecured Creditors to Debtors' Application to Retain*

*Counsel* to the Extent They Relate to the Retention of Seward & Kissel LLP [Docket No. 521]

***Objections Received:*** Joint Limited Objection and Reservation of Rights of the Ad Hoc Group of Prepetition Term Loan Lenders and Axar Capital Management to the Debtors' Applications to Retain Counsel [Docket No. 444]

Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Applications to Retain Counsel and Joinder in Part to the Joint Limited Objection and Reservation of Rights of the Ad Hoc Group of Prepetition Term Loan Lenders and Axar Capital Management to Such Applications [Docket No. 488]

14. ***Ankura Retention Application.*** Application of the Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to (I) Retain Ankura Consulting Group, LLC to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel and (II) Designate Stephen Marotta as Chief Restructuring Officer for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 32]

***Status:*** The hearing on this matter is going forward.

***Objection Deadline:*** March 7, 2019. The Committee's objection deadline is March 11, 2019.

***Related Documents:*** Interim Order Approving the Application of the Debtors to (I) Retain Ankura Consulting Group, LLC to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel and (II) Designate Stephen Marotta as Chief Restructuring Officer for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 294]

First Supplemental Declaration of Stephen Marotta in Support of the Debtors' Application to (I) Retain Ankura Consulting Group, LLC to Provide the Debtors as Chief Restructuring Officer, a Restructuring Officer and Certain Additional Personnel and (II) Designate Stephen Marotta as Chief Restructuring Officer and Adrien Frankum as Restructuring Officer for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 418]

***Objections Received:*** None to date.

15. ***Malfitano Advisors, LLC Retention Application.*** Debtors' Application for Entry of an Order, Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, (I) Authorizing Employment and Retention of Malfitano Advisors, LLC as the Debtors' Asset Disposition Advisor and Consultant, *Nunc Pro Tunc* to the Petition Date and (II) Granting Related Relief [Docket No. 30]

**Status:** The hearing on this matter is going forward.

**Objection Deadline:** March 7, 2019. The Committee's objection deadline is March 11, 2019.

**Related Documents:** Supplemental Declaration in Support of Debtors' Application for Entry of an Order, Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, (I) Authorizing Employment and Retention of Malfitano Advisors, LLC as the Debtors' Asset Disposition Advisor and Consultant, *Nunc Pro Tunc* to the Petition Date and (II) Granting Related Relief [Docket No. 39]

Interim Order Authorizing Retention and Appointment of Malfitano Advisors, LLC as Asset Disposition Advisor and Consultant *Nunc Pro Tunc* to the Petition Date [Docket No. 293]

Second Supplemental Declaration of Joseph Malfitano in support of the Debtors' Application for an Order Authorizing the Employment and Retention of Malfitano Advisors, LLC as the Debtors' Asset Disposition Advisor and Consultant as of the Petition Date [Docket No. 416]

**Objections Received:** None to date.

16. ***A&G Realty Partners, LLC Retention Application.*** Application of Debtors for Entry of an Order, Pursuant to 11 U.S.C. § 327(a) and 328(a), Bankruptcy Rules 2014 and 2016, and Local Rules 2014A and 2016-2, Authorizing the Retention and Employment of A&G Realty Partners, LLC as the Debtors' Real Estate Advisor *Nunc Pro Tunc* to the Petition Date [Docket No. 26]

**Status:** The hearing on this matter is going forward.

**Objection Deadline:** March 7, 2019. The Committee's objection deadline is March 11, 2019.

**Related Documents:** Interim Order Authorizing the Retention and Employment of A&G Realty Partners, LLC as the Debtors' Real Estate Advisor *Nunc Pro Tunc* to the Petition Date [Docket No. 198]

**Objections Received:** None to date.

17. ***Reevemark Retention Application.*** Debtors' Application Seeking an Order Authorizing the Employment and Retention of Reevemark, LLC as Corporate Communications Consultants to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 27]

**Status:** The hearing on this matter is going forward.

**Objection Deadline:** March 7, 2019. The Committee's objection deadline is March 11, 2019.

***Related Documents:*** Interim Order Authorizing Retention and Appointment of ReeveMark, LLC as Corporate Communications Consultants to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 199]

First Supplemental Declaration of Hugh Burns in Support of the Debtors' Application Seeking an Order Authorizing the Employment and Retention of ReeveMark, LLC as Corporate Communication Consultants to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 417]

***Objections Received:*** None to date.

Dated: March 14, 2019  
St. Louis, Missouri

/s/ Richard W. Engel, Jr.

Richard W. Engel, Jr. MO 34641

Erin M. Edelman MO 67374

John G. Willard MO 67049

**ARMSTRONG TEASDALE LLP**

7700 Forsyth Boulevard, Suite 1800

St. Louis, MO 63105

Telephone: (314) 621-5070

Facsimile: (314) 612-2239

Email: [rengel@armstrongteasdale.com](mailto:rengel@armstrongteasdale.com)

Email: [eedelman@armstrongteasdale.com](mailto:eedelman@armstrongteasdale.com)

Email: [jwillard@armstrongteasdale.com](mailto:jwillard@armstrongteasdale.com)

-and-

Ira Dizengoff (admitted *pro hac vice*)

Meredith A. Lahaie (admitted *pro hac vice*)

Kevin Zuzolo (admitted *pro hac vice*)

**AKIN GUMP STRAUSS HAUER & FELD LLP**

One Bryant Park

New York, NY 10036

Telephone: (212) 872-1000

Facsimile: (212) 872-1002

Email: [idizengoff@akingump.com](mailto:idizengoff@akingump.com)

Email: [mlahaie@akingump.com](mailto:mlahaie@akingump.com)

Email: [kzuzolo@akingump.com](mailto:kzuzolo@akingump.com)

- and -

Julie Thompson (admitted *pro hac vice*)

**AKIN GUMP STRAUSS HAUER & FELD LLP**

1333 New Hampshire Avenue, N.W.

Washington, D.C. 20036

Telephone: (202) 887-4000

Facsimile: (202) 887-4288

Email: [julie.thompson@akingump.com](mailto:julie.thompson@akingump.com)

*Proposed Counsel to the Debtors and Debtors in Possession*